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VIA-ELECTRONIC MAIL
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Carmen Ortiz
Jack Pirozzolo
Assistant United States Attorneys
John Joseph Moakley Federal Courthouse
1 Courthouse Way, Suite 9200
Boston, MA 02110

RE: *United States v. George Schussel*
Cr. No. 04-10060-RCL

Dear Carmen and Jack:

In accordance with Rule 16(b)(1)(C), we provide the following:

The defendant intends to present at trial Mr. James F. Dinell, of Needham, Massachusetts, to give expert testimony that, in his opinion, the Contract of Agreement dated September 9, 1993, was transmitted by a fax machine manufactured by the Sharp Electronics Corporation.

Mr. Dinell's opinion is based on his experience in the sale and installation of fax machines from 1982 to the present and on his familiarity with, and review of, sales and technical materials published by Sharp and customarily relied upon by persons engaged in sales and/or installation of Sharp fax machines.

A copy of Mr. Dinell's resume is enclosed herewith.

Thank you.

Yours truly,

A handwritten signature in black ink, appearing to read "M. Weinberg", with a large, stylized flourish at the end.

Martin G. Weinberg

Cc: Francis J. DiMento, Esq.
DiMento & Sullivan
7 Faneuil Marketplace, 3rd Floor
Boston, MA 02109

James F. Dinell
36 Eaton Road
Needham, Ma. 02492
(781) 449-1473 Cell (781) 640-2284
E-mail: jimd252@verizon.net

I have successful experience in sales management with demonstrated leadership ability in directing and motivating sales organizations to consistently achieve record sales performance.

Bay Copy – Rockland, MA. Business Development Manager 2001-2006

- Joined Bay Copy through the acquisition of Adcom Products
- Support Adcom customer base consisting of small, medium and major accounts. Including overseeing customer activities for a seamless transition to Bay Copy
- Responsible for Sharp facsimiles products and vertical marketing of Konica Minolta copiers to State Government and Municipalities

Adcom Products - Norwood, MA. Vice President of Sales 1987-2001

- Maintaining/increasing sales of Sharp copiers/facsimiles/Hewlett Packard printers And supply products
- Developed marketing strategies for increasing sales
- Full profit/loss responsibilities
- Recruit, hire, train and supervise sales staff
- Responsible for major account activity
- Prepare and execute bid proposals for state and local government agencies
- Maintain positive customer relations

Panasonic Corporation – Panafax Facsimile Division - Secaucus, NJ 1982-1986
Northeast Regional Manager

- Responsible for New England, plus upstate New York for all Panafax facsimile products
- Hire, train, assign and supervise staff of 12 sales executives
 - Recruited new dealers for sales and service through distribution channels in non-direct selling areas of the Northeast region
 - Supported and trained 26 independent dealer organizations throughout seven states

Education:

Newbury College – Associates Degree in Applied Science
 University of Massachusetts Lowell Campus – Bachelor Degree program
 Employer sponsored numerous seminars and workshops for sales and management courses